

1 Honorable Marsha Pechman
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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 JOVANNA EDGE, an individual; LEAH
11 HUMPHREY, an individual; LIBERTY
12 ZISKA, an individual; AMELIA POWELL, an
13 individual; NATALIE BJRKE, an individual;
14 BRITTANY GIAZZI, an individual; JUANITA
15 CASTANEDA GUERRERO, an individual;
16 and MATTESON HERNANDEZ, an
17 individual,

18 Plaintiffs,

19 v.

20 CITY OF EVERETT, a Washington Municipal
21 Corporation,

22 Defendant.

23
24 No. 2:17-cv-01361

25 STIPULATION AND PROPOSED
26 AGREED ORDER REGARDING
27 MOTION FOR PRELIMINARY
INJUNCTION BRIEFING SCHEDULE

STIPULATION

28 The parties hereto, by and through their respective counsel, have conferred regarding an
29 agreed briefing schedule on a Motion for Preliminary Injunction the Plaintiffs have stated they
30 will file. The parties propose the following due dates:

31 Motion for Preliminary Injunction

32 Thursday, September 21, 2017

33 City's Response to Motion

34 Monday, October 23, 2017

35 Plaintiffs' Reply (noting date)

36 Friday, November 3, 2017

37 STIPULATION AND PROPOSED AGREED ORDER
38 REGARDING MOTION FOR PRELIMINARY INJUNCTION
39 BRIEFING SCHEDULE - 1
40 Cause No. 2:17-cv-01361
41 20061 00005 gi14dd17t1

42 PACIFICA LAW GROUP LLP
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44 SUITE 2000
45 SEATTLE, WASHINGTON 98101-3404
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1 The parties respectfully request that the Court set a date for oral argument of the motion
2 as soon as reasonably possible following the noting date.

3 The parties agree that they have conducted an initial conference regarding discovery and
4 that the parties may conduct discovery with respect to this motion.

5 The parties also agree, in light of the injunction proceedings, to extend the date to answer
6 the complaint until October 30, 2017.

7 This stipulation is entered solely for the purpose of facilitating prompt and efficient
8 briefing and consideration of Plaintiffs' motion for the benefit of the Court and the parties
9 without the need for emergency motions practice. As part of this stipulation, the City will
10 voluntarily refrain from enforcement of Ordinance 3560-17 and the amendments in section 1 of
11 Ordinance 3559-17 until after this Court rules on the Motion for Preliminary Injunction.
12 Nothing in this stipulation will be construed as evidence of or an admission that any of Plaintiffs'
13 claims do or do not have merit, and no party may cite to this stipulation in aid of or in opposition
14 to any request for substantive relief, including any relief requested in the Motion for Preliminary
15 Injunction.

16 The parties, therefore, now stipulate to the foregoing and request that the Court enter the
17 Order subjoined hereto.

18 DATED this 15th day of September, 2017.

19 NEWMAN DU WORS LLP

20 PACIFICA LAW GROUP LLP

21 By s/Derek A. Newman

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23 Jessica V. Newman, WSBA #28080
24 Keith Scully, WSBA #28677
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26 By s/ Matthew J. Segal

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28 CITY OF EVERETT

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30 *Attorneys for Defendant City of Everett*

31 *Attorneys for Plaintiffs*

32 STIPULATION AND PROPOSED AGREED ORDER
33 REGARDING MOTION FOR PRELIMINARY INJUNCTION
34 BRIEFING SCHEDULE - 2
35 Cause No. 2:17-cv-01361
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ORDER

Based on the foregoing stipulation of the parties, the Court hereby ORDERS that the Motion for Preliminary Injunction shall be subject to the following agreed briefing schedule:

Motion for Preliminary Injunction Thursday, September 21, 2017

Plaintiffs' Reply (noting date) Friday, November 3, 2017

The parties may conduct discovery pursuant to their agreement.

The City shall file an answer to the complaint by October 30, 20

The City shall file an answer to the complaint by October 30, 2017.

DATED this ____ day of September, 2017.

Honorable Marsha Pechman

Jointly Presented by:

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STIPULATION AND PROPOSED AGREED ORDER
REGARDING MOTION FOR PRELIMINARY INJUNCTION
BRIEFING SCHEDULE - 3
Cause No. 2:17-cv-01361
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